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February 24, 2021

VIA CM/ECF

The Honorable Sarah Netburn
United States Magistrate Judge
U.S. District Court for the
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

Re: *The Phillies v. Harrison/Erickson, Inc., et al., C.A. No. 19-7239-VM-SN*

Dear Judge Netburn:

I am requesting a one-week extension until March 8, 2021 for The Phillies to file its combined reply brief in support of its motions for partial summary judgment and to dismiss, and opposition to defendants' motion for summary judgment, which, pursuant to the conference with the Court on October 22, 2020 (pp. 53-54), is currently due on Monday, March 1. A number of my team's matters have heated up all at once, and we are all, frankly, feeling a bit overwhelmed. In addition, I'm due to get my second Pfizer vaccine shot later this week and I'm concerned it could put me out of commission for a few days.

Mr. Montclare has graciously agreed to our request, and he noted that his team would appreciate an extra week to file defendants' reply brief in support of their motion for summary judgment, which we of course consent to. Mr. Montclare's current deadline is March 22; so giving his team four weeks instead of three after our deadline of March 8 would make defendants' deadline April 5, 2021.

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Thank you for Your Honor's consideration of my request.

Respectfully,

/s/ David J. Wolfsohn

David J. Wolfsohn

DJW/kah

cc: Paul D. Montclare, Esq.
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